



U.S. Department of Justice

Michael J. Sullivan
United States Attorney
District of Massachusetts

Main Reception: (617) 748-3100

John Joseph Moakley United States Courthouse
1 Courthouse Way
Suite 9200
Boston, Massachusetts 02210

February 6, 2006

David P. McCormack, Esquire
SUGARMAN & SUGARMAN
One Beacon Street
Boston, MA 02108

Re: Sheryl Satterthwaite As Executrix
of the Estate of Dennis Satterthwaite vs. United States
No. 05-10606 REK

Dear Mr. McCormack:

This letter is sent to you in accordance with the defendant's automatic discovery obligations pursuant to Fed. R. Civ. P. 26(A)(1) and L. R. 26.2(A):

I. Rule 26(A)(1) and L. R. 26.2(A):

(A) the name and (if known) the address and telephone number of each individual likely to have discoverable information relevant to disputed facts alleged with particularity in the pleadings, identifying the subjects of the information:

In addition to the plaintiff and any and all relatives of the decedent, the defendant identifies the following witnesses. Please note that the defendant is unable to provide the addresses and telephone numbers of many of these witnesses pursuant to the Federal Privacy Act, 5 U.S.C. § 552a. If necessary, the defendant will make all efforts to make these service members available as witness if necessary. If unable to do so, at that time the United States will file a motion with the Court to provide the information to the plaintiff.

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|--------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------|
| 1. John L. Randolph, Ed.D. | 11. Maureen A. Malin, M.D. |
| 2. David Reis, Social Worker | 12. Michelle Cooper
Norwood Psychology |
| 3. Jayleen Azcona, M.D. | 13. Kathy Horwitz, R.N.
Westwood Lodge |
| 4. Agnes Suarez, M.D. | |
| 5. Arthur Pappas, M.D.
45 Clapboardtree Street
Westwood, MA | 14. Rochelle Cooper, C.N.S.
Nova Psychiatric
Quincy, MA |
| 6. Robert Lasky, M.D. | 15. Kim Desjardin |
| 7. Deborah Rhatigan | 16. Any and all individuals listed in the
Department of Mental Health Investigation
report. |
| 8. Barbara Wolfsdorff, Ph.D. | |
| 9. Catherine Sullivan, R.N.C.
45 Clapboardtree Street
Westwood, MA | |
| 10. Peter Pillitteri, M.D.
Jordan Hospital
275 Sandwich Street
Plymouth, MA 02360 | |

In that the United States has not yet been provided with complete sets of relevant medical/hospital records, it specifically reserves the right to supplement this response in a seasonable fashion upon receipt of same and after counsel has had an opportunity to review them to determine whether the documents identify additional individuals that may possess discoverable information relevant to disputed facts.

(B) a copy of, or a description by category and location, of all documents, data compilations, and tangible things in the possession, custody, or control of the party that are relevant to disputed facts alleged with particularity in the pleadings.

The defendant has copies of the following documents:

1. Jordan Hospital record of 04/28/02;
2. McLean Hospital record of 04/28/02 admission;
3. Westwood Lodge Hospital of 05/07/02 admission;

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4. Hospital records from the VA Medical Center;
5. Documents submitted in the administrative claim.

(C) a computation of any category of damages claimed by the disclosing party, making available for inspection and copying as under Rule 34 the documents or other evidentiary material not privileged or protected from disclosure, on which such computation is based, including materials bearing on the nature and extent of the injuries suffered:

Not applicable.

(D) for inspection and copying as under Rule 34 any insurance agreement under which any person carrying on an insurance business may be liable to satisfy part of all of a judgment which may be entered in the action or to indemnify or reimburse for payments made to satisfy the judgment:

Not applicable.

Records from the Veteran's Administration will be provided upon our receipt of a complete set. Thank you very much for your attention to this matter.

Very truly yours,

MICHAEL J. SULLIVAN
United States Attorney

By: /s/james j. mcgovern
JAMES J. MCGOVERN
Assistant U.S. Attorney

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cc/ Attorney Janet Bobit
Attorney James P. Donohue, Jr.